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1 through her -- right through her delivery.

2 Q. And do you remember when Raquel contacted me
3 because you accidentally sent her an email saying that
4 she was a cunt and should be fired?

5 MR. HARRISON: Okay. Just -- objection.
6 Compound nature. Vague.

7 BY MS. RICHARDSON:

8 Q. Okay. Do you remember --

9 MR. HARRISON: I -- are we agreeing that I have
10 a continuing objection to all these questions as
11 intimidation and harassment and not related at all --

12 MS. RICHARDSON: Understood.

13 MR. HARRISON: -- to this litigation?

14 MS. RICHARDSON: Understood.

15 BY MS. RICHARDSON:

16 Q. Were you -- were you aware that Raquel would
17 reach out to me frequently with questions about the
18 properties and the staging of the Bel Air home?

19 MR. HARRISON: Objection. Compound. Calls for
20 speculation. Assumes facts not in evidence.

21 THE WITNESS: I had no idea. Raquel was not
22 showing up much for anything, so --

23 BY MS. RICHARDSON:

24 Q. Were you aware that -- sorry.

25 Do you remember sending me, to that point, to

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1 your Santa Monica home to make sure that work was being
2 accomplished?

3 A. I don't recall I sent you. I think at one
4 point you suggested that you would -- it might be a good
5 idea if you were to check in when I was out of the
6 country.

7 So no. I didn't instruct you to go.

8 Q. You did not instruct me to go?

9 A. I did not instruct you to go.

10 Q. Are you sure of that?

11 MR. HARRISON: Objection. Asked and answered.

12 BY MS. RICHARDSON:

13 Q. Okay. So you did not instruct me to go see
14 Raquel.

15 Now, when -- on or about that time three of
16 your small dogs required dental surgery. Do you
17 remember that?

18 A. I remember the three dogs had dental surgery.
19 I don't remember the actual date.

20 Q. And do you remember that your staff from Canada
21 flew them to Los Angeles to have a dental surgery in
22 San Diego?

23 MR. HARRISON: Objection. Compound. Vague.
24 Totally irrelevant.

25 Go ahead. You can try and answer.

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1 THE WITNESS: The dogs had dental surgery in
2 San Diego because that's where the specialist was.

3 BY MS. RICHARDSON:

4 Q. And do you remember you and Madeleine were not
5 in the country at the time and that the dogs were going
6 to have to stay in Los Angeles for their recovery
7 period? Is that familiar?

8 MR. HARRISON: Objection. It's just you
9 testifying some more, Ms. Richardson.

10 MS. RICHARDSON: I'm asking --

11 MR. HARRISON: There is nothing about this --

12 MS. RICHARDSON: I'm asking a question.

13 MR. HARRISON: Then ask a question.

14 BY MS. RICHARDSON:

15 Q. Taylor, do you remember that after the dogs had
16 dental surgery, they had to stay in Los Angeles?

17 A. Yes, I remember that.

18 Q. Do you remember asking me to meet with a
19 housekeeper, who was going to watch the dogs?

20 A. I don't remember asking you to meet with --
21 with the housekeeper. I do know -- I do remember there
22 was a housekeeper that was going to look after the dogs.

23 Q. Do you remember that on or about November 14th,
24 Raquel came to my home at 1:00 in the morning and banged
25 on my window because Twigs [phonetic] was having a

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1 medical emergency?

2 MR. HARRISON: Objection. Vague. Calls for
3 speculation. Assumes facts not in evidence.

4 You're saying -- you asked her if she
5 remembered?

6 MS. RICHARDSON: Yes.

7 MR. HARRISON: Was she there?

8 BY MS. RICHARDSON:

9 Q. Do you -- let me -- let me rephrase the
10 question. Let me rephrase the question.

11 On or about November 14th Raquel came to my
12 home in the middle of the night because Twigs was having
13 a medical emergency. Do you remember that?

14 MR. HARRISON: Objection. Compound.
15 Testifying. Assumes facts not in evidence.

16 Go ahead. Try and answer.

17 THE WITNESS: Well, I was -- I was out of the
18 country --

19 BY MS. RICHARDSON:

20 Q. Right.

21 A. -- and I -- 1:00 in the morning -- you said it
22 -- you're -- you're in L.A. I don't -- I don't recall.
23 I wasn't there. But my understanding is that she did
24 reach out to you when there was -- when -- when Twigs
25 had an issue.

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1 Q. And --

2 A. Yeah.

3 Q. And do you know why she came to my house?

4 A. No idea. I'm -- I think it's probably
5 because -- I'm only guessing. I could not -- I could
6 not presume to know.

7 Q. I -- I believe that the reason was that the
8 staff was afraid that you would be upset.

9 MR. HARRISON: Objection. That's not a
10 question. It's a statement. It's more testimony from
11 Ms. Richardson.

12 MS. RICHARDSON: Okay. She asked a question,
13 so I just answered it. I apologize. You're correct.
14 BY MS. RICHARDSON:

15 Q. When Raquel came to me to ask for guidance on
16 the medical emergency, she also needed a form of payment
17 for the vet.

18 Were you aware that I provided that payment for
19 the emergency medical procedure?

20 MR. HARRISON: Same objections as the last
21 question.

22 THE WITNESS: I don't recall. I wasn't in the
23 country and --

24 BY MS. RICHARDSON:

25 Q. Okay. You were -- do you remember me informing

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1 you that a series of events occurred on or about the
2 night of November 14th in which your dog was
3 hospitalized and required emergency medical attention?

4 MR. HARRISON: Objection. Compound.

5 MS. RICHARDSON: Understood.

6 MR. HARRISON: Hard to understand.

7 MS. RICHARDSON: Okay. I'm going to keep the
8 question as is.

9 THE WITNESS: I recall -- I wasn't there, but I
10 recall that the -- there was a friend of Raquel's -- it
11 wasn't even Raquel -- that was looking after the dog,
12 and the dog apparently got into a weed gummy, and
13 they -- whether they took her to the hospital -- they
14 wouldn't allow her to get tested because they didn't
15 want -- they obviously did not want it to be revealed
16 that they had used negligence and when they were meant
17 to be looking after the dog, instead that they allowed
18 to the dog to ingest something that could have killed
19 the dog. And somehow they ended up calling you probably
20 because they were pretty scared that they had almost
21 killed Madeleine's dog out of negligence.

22 BY MS. RICHARDSON:

23 Q. And after this event occurred do you remember
24 asking me to go and pick up the dogs from the
25 housekeeper's house?

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1 A. Yes. I believe I had you pick up the dogs and
2 give them to K.J. Did you not?

3 Q. Yes. Because I was --

4 MR. HARRISON: Just -- if you know something,
5 then you should say it to the best of your ability; but
6 you should not guess or speculate.

7 THE WITNESS: I'm -- my best understanding --
8 as I said, I wasn't there -- yes. I -- somehow you were
9 asked -- you picked up the dogs and delivered them to my
10 friend, who was going to stay with them in our house.

11 BY MS. RICHARDSON:

12 Q. It's correct that I was going out of town that
13 day and so I met K.J. at the housekeeper's house. I was
14 instructed by you and Madeleine not to tell the
15 housekeeper I was removing the dogs.

16 Do you remember that?

17 MR. HARRISON: Objection. Compound.
18 Testimony. Not really in the form of the question.

19 BY MS. RICHARDSON:

20 Q. Do you remember --

21 MR. HARRISON: Not sure I understand --

22 BY MS. RICHARDSON:

23 Q. Do you remember instructing me to bring cash
24 with me when I picked up the dogs to pay the
25 housekeeper?

1 MR. HARRISON: Objection. Compound.

2 Go ahead and try and answer --

3 THE WITNESS: I wasn't in the country, and I
4 don't actually remember that detail. I just remember
5 that the dogs needed to be picked up and removed and
6 cared for by someone responsible, obviously a friend of
7 mine.

8 BY MS. RICHARDSON:

9 Q. And were you aware that I brought -- I -- I
10 apologize. I can't remember her name -- but I brought
11 the housekeeper \$2,000 that day when I picked up the
12 dogs?

13 A. I --

14 MR. HARRISON: Objection -- objection. Asked
15 and answered. Assumes facts not in evidence.

16 MS. RICHARDSON: Okay.

17 MR. HARRISON: I guess calls for speculation.

18 MS. RICHARDSON: Got it.

19 BY MS. RICHARDSON:

20 Q. Go ahead.

21 A. Yeah. Don't -- I don't actually -- I don't
22 remember that detail.

23 Q. Okay.

24 A. I really just remember the dog had gotten into
25 weed gummies, they weren't allowing her to be tested,

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1 and the dog could have died easily.

2 Q. Do you remember that after the 2019 trip we
3 discussed earlier in Vancouver, BC, we didn't talk as
4 much for a while?

5 Do you remember -- do you remember that trip at
6 all?

7 MR. HARRISON: Objection. Compound.
8 Testifying.

9 THE WITNESS: No.

10 MR. HARRISON: Improper form.

11 BY MS. RICHARDSON:

12 Q. After we went on the trip to Victoria and
13 Tofino in September of 2019, I saw you very briefly when
14 we flew together to Toronto for me to stay with
15 Madeleine.

16 You remember that trip; correct?

17 MR. HARRISON: Objection. Compound.

18 Go ahead and try and answer.

19 THE WITNESS: I remember you came to -- I
20 remember you coming to Toronto. I don't the date.

21 BY MS. RICHARDSON:

22 Q. Yeah. It was -- it was mid-November 2019.

23 And after that, I saw you very briefly prior to
24 the COVID pandemic; but because of the pandemic, we did
25 not see each other as much in those early months.

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1 Is that correct?

2 A. I was not -- I -- best of my recollection, I
3 didn't live in L.A., you were living in L.A. -- you
4 spent COVID in L.A.

5 Q. Yes. Do you remember encouraging me to come to
6 Toronto before the lockdown occurred?

7 A. No.

8 Q. You don't.

9 And do you remember that the summer of 2020
10 Madeleine celebrated her 21st birthday and we went
11 together to the Bahamas?

12 A. Yes. I remember the Bahamas and, of course,
13 Madeleine's birthday.

14 Q. And do you remember any tension in our
15 friendship at that time?

16 MR. HARRISON: Objection. Vague.

17 THE WITNESS: And I don't remember any tension.

18 BY MS. RICHARDSON:

19 Q. You don't.

20 And --

21 A. No. You were -- you were one of our guests on
22 a boat -- you and Michelle. You don't invite people on
23 a boat you're expecting to have tension from.

24 Q. Two months after that trip I sent you a letter
25 where I said that things had changed with our

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1 relationship and I asked if I had done something wrong
2 and I -- I apologized if I had because I noticed there
3 had been a remarkable shift.

4 Do you remember that letter?

5 MR. HARRISON: Objection. Compound.
6 Testifying incompletely again. And assumes facts not in
7 evident.

8 And also, do you have the document? Do you
9 have the letter that you want to show her?

10 THE WITNESS: I'd like to see it.

11 MS. RICHARDSON: It's -- it's in production. I
12 can read it to you. I do not have it printed out.
13 It's -- it's -- it's been produced, though. It's in the
14 folders.

15 MR. HARRISON: But it's not our -- we don't
16 know --

17 MS. RICHARDSON: I -- no. I understand. I can
18 show you -- I don't --

19 MR. HARRISON: If you want to --

20 DEPOSITION OFFICER: Okay. One at a time.

21 MR. HARRISON: That's our request.

22 MS. RICHARDSON: Okay. Thank you.

23 BY MS. RICHARDSON:

24 Q. We've established that you don't -- is it fair
25 to say you don't remember there being tension in our

Page 308

1 relationship at that time?

2 A. I don't recall there -- there being tension in
3 our relationship.

4 Q. You spent Christmas in Malibu in 2020.

5 Do you -- do you remember that?

6 A. I would have to look at the calendar.

7 Q. Okay. I had several conversations with
8 Madeleine during that time, who was concerned about the
9 tension in our friendship.

10 Do you have any recollection of that?

11 MR. HARRISON: Objection. That was not a
12 question; that was a testimonial. So objection to the
13 form.

14 MS. RICHARDSON: Let me -- let me --

15 MR. HARRISON: Compound.

16 MS. RICHARDSON: Let me go ahead and withdraw
17 the question and move to a different topic.

18 BY MS. RICHARDSON:

19 Q. You did not invite me to come to the house at
20 all during your trip to Malibu during the holidays in
21 2020. Do you have a recollection of that?

22 MR. HARRISON: Objection. Compound.

23 Testifying. Improper form.

24 MS. RICHARDSON: I'm going to keep the question
25 as is.

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1 THE WITNESS: And I don't recall that.

2 BY MS. RICHARDSON:

3 Q. In January of 2021 Dora got sick with COVID.

4 Do you have any memory of that?

5 MR. HARRISON: Objection. Testifying. Assumes
6 facts not in evidence.

7 You can answer to the best of your ability.

8 THE WITNESS: No. No.

9 BY MS. RICHARDSON:

10 Q. During that time, you and Madeleine both had
11 scheduled surgeries and it was the height of the
12 pandemic. Do you remember that?

13 MR. HARRISON: Objection. Compound. Form of
14 the question. Assumes facts not in evidence. It's
15 essentially testifying again.

16 Go ahead, try and answer.

17 THE WITNESS: There again, I'd have to look at
18 the calendar.

19 BY MS. RICHARDSON:

20 Q. Do you remember having --

21 A. My deviated septum?

22 Q. No.

23 MR. HARRISON: There is no question on the
24 table. Just wait till she asks a question.

25 THE WITNESS: I'm sorry.

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1 BY MS. RICHARDSON:

2 Q. You had a facelift in 2021 January, and

3 Madeleine had a procedure shortly thereafter.

4 Do you -- do you remember that?

5 MR. HARRISON: Objection. It's testimony.

6 This is, as usual, intimidating and harassment. Has

7 absolutely --

8 MS. RICHARDSON: It is not.

9 MR. HARRISON: -- nothing to do with the
10 litigation whatsoever.

11 MS. RICHARDSON: This has to do exactly with
12 the litigation.

13 MR. HARRISON: So you go ahead and continue to
14 make the record that this is --

15 MS. RICHARDSON: Go ahead.

16 MR. HARRISON: -- how you conduct a
17 deposition --

18 MS. RICHARDSON: Go ahead.

19 MR. HARRISON: -- Ms. Richardson.

20 MS. RICHARDSON: Go ahead, Mr. Harrison.

21 MR. ANDRE: Ms. Richardson, I'd also like to
22 ask -- it is 6:00 o'clock now. You have a court
23 reporter and a videographer here --

24 MS. RICHARDSON: I understand.

25 MR. ANDRE: -- and -- and we spent, I believe,

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1 about 30 minutes with you asking questions about
2 Ms. Thomson's dogs. So part of our issue here is
3 that -- and part of the harassing nature of these lines
4 of questioning is when you spend hours upon hours asking
5 questions that have no direct relevance to your claims
6 or Ms. Thomson's claims, that is our concern.

7 MS. RICHARDSON: This --

8 MR. ANDRE: So --

9 MS. RICHARDSON: I --

10 DEPOSITION OFFICER: Okay. One at a time.

11 MR. ANDRE: If you would like to articulate to
12 us why a personal medical procedure performed on
13 Ms. Thomson's daughter is relevant to your defamation
14 claim or relevant to our claims for fraud, I'm happy to
15 hear it; but I don't think you can.

16 MS. RICHARDSON: Counsel, I'm going to continue
17 with my questions because --

18 MR. ANDRE: Okay.

19 MS. RICHARDSON: -- there is relevance; and if
20 you have an issue with it, you can have it redacted
21 after the fact; but I'm going to finish the question --

22 MR. HARRISON: What is the relevance?

23 MS. RICHARDSON: I'm going to finish the
24 question, Mr. Harrison.

25 MR. HARRISON: So you're -- just for the

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1 record, you're refusing to answer that question; is that
2 right?

3 MS. RICHARDSON: If you --

4 MR. HARRISON: You're refusing to state the
5 relevance of the question on the record?

6 MS. RICHARDSON: The relevance will come
7 through in the next question. Would you like me to
8 finish with my line of questioning, or are you going to
9 interrupt my questioning and --

10 MR. HARRISON: I -- I would like you to state
11 the relevance of the --

12 MS. RICHARDSON: Mr. Harrison, I have the right
13 to finish my questioning and -- and you do not have the
14 right to interrupt me in the middle of that.

15 MR. HARRISON: We actually do have the right to
16 make our objections to make our record --

17 MS. RICHARDSON: I heard your objection. It's
18 recorded.

19 MR. HARRISON: -- especially when we gave you
20 full warnings about these issues --

21 MS. RICHARDSON: Your objections --

22 MR. HARRISON: -- prior --

23 DEPOSITION OFFICER: Okay. One at a time.

24 BY MS. RICHARDSON:

25 Q. Ms. Thomson, do you remember having a surgical

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1 procedure during January of 2021 and -- let me just say
2 this. Let me -- let me just take that off the table.

3 You needed medical assistance, and you did not
4 have the staff to help you. Do you remember that?

5 A. No.

6 Q. You don't.

7 Do you remember that your daughter reached out
8 to me and said that you wanted me to drive you to your
9 hyperbaric chamber appointment?

10 MR. ANDRE: Objection. Vague. Compound.
11 Calls for speculation.

12 MS. RICHARDSON: Noted.

13 MR. HARRISON: Well, you also said that the
14 relevance of this line of questioning would be apparent
15 with the next question. I waited two more questions,
16 and I haven't seen the relevance.

17 MS. RICHARDSON: Okay. So you want me to spell
18 it out for you?

19 MR. HARRISON: Yeah. I would like --

20 MS. RICHARDSON: Let me spell it out for you,
21 if you would like me to.

22 MR. HARRISON: Yes.

23 MS. RICHARDSON: Taylor and Madeleine had
24 surgeries back to back in January of 2020. In December
25 they did not call me or invite me to the house, which is

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1 very unlike them because we were close. There was a big
2 shift in our relationship.

3 At this time they had surgery. Their staff in
4 Toronto refused to come out because it's the height of
5 the pandemic and they didn't want exposure, and their
6 one Los Angeles staff member had COVID. Now, this was
7 the time when they called me finally and they said,
8 Please come and help us get through this.

9 I said, Great.

10 Then the next call I got was, Mother needs you
11 to take her to the hyperbaric chamber because she
12 doesn't want to be exposed by an Uber driver.

13 I had a work call that day; so I said, I have a
14 work call.

15 I was also very afraid of COVID exposure, which
16 they knew. But if I had hadn't had the work call, I
17 would have done it.

18 When I said no, I did not hear from either of
19 them for three months; and I was told by Madeleine that
20 that was when -- and it wasn't directly from Taylor, to
21 be fair -- that that was when I showed my true colors
22 and -- and you decided you did not want to be friends
23 with me.

24 MR. HARRISON: So you're upset that they didn't
25 want to be friends with you. What does that have to do

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1 with Ms. Thomson's claims --

2 MS. RICHARDSON: I'm not upset about anything.

3 MR. HARRISON: What -- no. No. I'm not done
4 talking --

5 MS. RICHARDSON: This has to do with a
6 pattern --

7 DEPOSITION OFFICER: Okay. One at a time.

8 MR. HARRISON: I let you talk. Now I'm
9 talking.

10 MS. RICHARDSON: This has --

11 MR. HARRISON: This has nothing to do with
12 Ms. Thomson's claims of fraud against you or your claims
13 against her of defamation and intentional infliction of
14 emotional distress.

15 MS. RICHARDSON: This does --

16 MR. HARRISON: Nothing that --

17 DEPOSITION OFFICER: Okay. One at a time.

18 MR. HARRISON: Nothing that you just said in
19 that recitation has anything to do with -- touching even
20 remotely on any of this.

21 MS. RICHARDSON: Todd, you have -- you are now
22 just taking my time. I'm trying to finish my
23 questioning. So I'm going -- I'm going to respectfully
24 finish my questioning so we can all go. Is that an
25 agreement? Let me get --

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1 MR. HARRISON: How much more questioning do you
2 have?

3 MS. RICHARDSON: I have -- I have -- I have ten
4 minutes. Let's just say that.

5 THE WITNESS: Can I just address that
6 hyperbaric thing?

7 MR. ANDRE: No. No.

8 MR. HARRISON: There's no question pending.

9 MR. ANDRE: No question pending.

10 MS. RICHARDSON: Let's go back to that
11 question, and then you can address it all you would
12 like.

13 MR. HARRISON: Just to be clear, I'm still
14 maintaining my objection to --

15 MS. RICHARDSON: Are you telling her not to
16 answer?

17 MR. HARRISON: No. I'm telling --

18 DEPOSITION OFFICER: Okay. Hold on.

19 MR. HARRISON: I'm asking you again to make it
20 clear on the record that I have -- you agree that I have
21 a continuing objection into this line of questioning --

22 MS. RICHARDSON: Todd, I agree.

23 MR. HARRISON: -- I'm not done talking -- as
24 intimidation and harassment. You agree with that?

25 MS. RICHARDSON: I don't agree that it's

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1 intimidation and harassment.

2 MR. HARRISON: Do you agree that I have a
3 continuing objection on the record?

4 MS. RICHARDSON: I agree that you have an
5 objection on the record.

6 MR. HARRISON: Thank you.

7 What's the question?

8 BY MS. RICHARDSON:

9 Q. The question is, do you remember wanting me to
10 drive you that day and me not being able to?

11 MR. HARRISON: Objection. Compound.

12 BY MS. RICHARDSON:

13 Q. Do you remember wanting me to drive you to your
14 hyperbaric chamber appointment, Taylor, in late January
15 of 2021?

16 A. I don't recall you wanting to -- me wanting you
17 to drive me to the appointment. I saw in these
18 documents the text from Madeleine, which basically said,
19 Hey, I'm worried about her getting in an Uber. And
20 would you be free? If not, no big deal, at which point
21 you said no, and that was that.

22 It was no big deal. It was no big deal.

23 Q. Are you --

24 A. Exactly as -- Madeline said something to that
25 effect. It's -- if not, no worries or no bother. Don't

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1 worry. There was no -- no pressure.

2 That's what she at said the end, No pressure --

3 Q. I --

4 A. -- which there was no pressure. It's, like --
5 you're an adult. If you're busy, you're busy. You got
6 a meeting, you got a meeting.

7 Q. Were you aware --

8 A. Everyone's got their own free will.

9 Q. Were you aware that afterwards Madeleine said
10 my not taking you was what changed -- signaled to both
11 of you that I was a disloyal friend?

12 MR. HARRISON: Objection. Compound. Calls for
13 speculation.

14 MS. RICHARDSON: That's fine.

15 THE WITNESS: And no, I wasn't aware.

16 BY MS. RICHARDSON:

17 Q. Okay.

18 A. I don't -- I don't believe that that occurred.
19 I don't believe that that was the case because it --
20 this was not a big deal. It was not a big deal. You
21 were busy. You had a meeting. It was like, there's --
22 there's no -- there's no expectation there.

23 Q. I did not hear from you until -- I did not hear
24 from you again until March; and when I heard from you at
25 the end of March, I think you're familiar with this text

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1 message exchange where you asked me to check on the
2 Malibu house before someone came to look at it.

3 Do you have a memory of that?

4 MR. HARRISON: Objection. Compound -- multiple
5 compound. Testifying. Not really asking a question.

6 MS. RICHARDSON: Okay.

7 MR. HARRISON: Try and answer to the best of
8 your ability.

9 THE WITNESS: This is -- there again, this is
10 not a big -- this would not have been a big deal or a
11 big, memorable event. I think I was -- there was one
12 time where I believe I was not in the country;
13 otherwise, it would have been a no-brainer for me. I
14 believe I was -- I was not at -- not in -- not in L.A.
15 and not in America. I don't remember where I was.

16 BY MS. RICHARDSON:

17 Q. You weren't.

18 A. I -- yeah. I remember a real estate agent
19 wanted to see the Malibu house, I thought it was; and I
20 wanted to make sure that the housekeeper, who was
21 probably not -- I just wanted to make sure that the
22 housekeeper hadn't left the place a mess, that it was
23 actually presentable for the real estate agent -- to
24 have someone to make sure that she hadn't left a mess,
25 that she'd actually done her job.

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1 Q. And do you remember that I was eager to go over
2 and check on it for you?

3 MR. HARRISON: Objection. Calls for
4 speculation. Compound.

5 BY MS. RICHARDSON:

6 Q. Do you remember my going over to -- to check on
7 it for you?

8 A. I -- I recall it wasn't a big deal. You didn't
9 have a problem with it.

10 Q. And do you remember asking me to help you
11 rehome your chickens in 2019?

12 A. In 2019 -- whenever that was, we needed a new
13 home because had rats; and I thought if anyone that I
14 knew might know someone with chickens, that might well
15 be you, which, of course, was the case. So you had a
16 friend, I believe, that you called; and your friend was
17 happy to take the chickens; so I think you took them
18 over to your friend's place.

19 Q. And is it fair to say that I was eager and
20 happy to do it?

21 A. Yeah. You were a friend. It was nothing.
22 It's no big deal.

23 Q. And do you remember --

24 A. This wasn't always a -- asking you to go
25 down -- to charge down the beach at D Day.

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1 Q. Right. And do you remember that there were
2 multiple occasions where I went to your Bel Air home to
3 help with the process of staging it for sale, including
4 helping with getting new photos taken when you were
5 unhappy with them?

6 MR. HARRISON: Objection. Compound.
7 Go ahead.

8 THE WITNESS: No. That's not exactly -- it's
9 just everything's out context. Didn't happen that way.

10 We already had -- we had photographs. There
11 was one photograph of the living room where they didn't
12 do a wide enough angle; so your partner, Michelle,
13 offered -- and she was really happy -- suggested to
14 do -- to do a large -- a photo where she caught the
15 piano in the whole shot.

16 So everything was there -- what they -- the
17 real estate agent had done in the brochure, and then
18 there was the one shot of -- of Michelle's where she got
19 credit and -- and she was really happy. She said she
20 was happy.

21 And in terms of staging, staging is usually
22 taking an empty house and you fill it with furniture. I
23 believe you --

24 BY MS. RICHARDSON:

25 Q. Right.

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1 A. -- you know, you ordered flowers -- you bought
2 flowers and a few things like that to make it
3 presentable --

4 Q. So --

5 A. -- my recollection.

6 Q. And do you remember that, you know, in past
7 trips that Michelle would take -- that's a good point --
8 like, photos of you and your daughter when we were on
9 those vacations?

10 A. Yeah. She was a photographer. That's what she
11 loved.

12 Q. And she would make sometimes photo books of
13 those trips?

14 A. Yeah.

15 Q. And there is one sort of constant that, you
16 know, has been through this, that -- that we showed up
17 and we were happy to do it. I know you mentioned the
18 cryptocurrency; but I think could agree that throughout
19 our friendship, when you've asked me to do things for
20 you, I showed up and I was happy to -- to help; is that
21 correct?

22 MR. HARRISON: Objection. Compound. Calls for
23 speculation.

24 BY MS. RICHARDSON:

25 Q. Do you remember a time when you ever asked me

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1 to do something and I wasn't happy to help you?

2 A. No. I don't remember -- there were little
3 things -- there were little things that you -- that, you
4 know, I think I probably asked you to do. They weren't
5 a big deal, so they weren't exactly very memorable.
6 And, I mean, the only time that I remember is -- only
7 because it was pointed out, is when you couldn't go to
8 the hyperbaric. No big deal.

9 Q. And -- and I just want to say that, you know,
10 it has been pointed out consistently through this
11 process and it was, I believe, in your testimony in the
12 Singapore arbitration that you felt that because you had
13 taken me on trips in the past, that it was an exchange
14 of some sort.

15 Is that your understanding?

16 A. My understanding --

17 MR. HARRISON: Objection. Vague. Calls for
18 speculation.

19 MR. ANDRE: Misstates prior testimony.

20 THE WITNESS: My understanding from you -- from
21 your words is that you were -- you would never -- you
22 were so grateful -- you and Michelle were very -- from
23 what I gathered and you said, that you were very happy
24 to be included in -- because you were friends -- and go
25 on all these trips with us and have us always be paying

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1 for dinner and that -- you used to say there is
2 absolutely nothing that you would ever be able to do to
3 repay us.

4 And not that I ever would have asked you to,
5 but that you said any time, I'd like to be able to help
6 you do something when you're out of town, look in on
7 your place. And it's no different than what I have
8 other friends -- exactly have the same sentiment, which
9 is so sweet; and it's not expected.

10 But that was my understanding. It wasn't
11 something I expected as a -- invited you on a boat trip,
12 it's because you two were very, very dear friends. That
13 was it. There was no -- not meant to be any payback for
14 that.

15 BY MS. RICHARDSON:

16 Q. And at any point along the way did you ever get
17 the feeling that I wasn't eager to help at any time that
18 I could, aside from obviously the hyperbaric, which we
19 pointed out?

20 A. Yeah. Because you couldn't.

21 Q. And despite that, do you still feel -- I know
22 that you have alleged that looking back -- one of the
23 things that was alleged to the press was that, looking
24 back, you see signs that you should have seen; and one
25 of though allegations was that I took advantage of our

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1 friend Beau when she was sick with cancer.

2 And I would like to know, when you say that I
3 took advantage of her or that I was doing something
4 untoward or that there were signs, could you tell me
5 what those were?

6 MR. ANDRE: Objection. Vague. Ambiguous.
7 Compound.

8 MS. RICHARDSON: Understood. You're right.

9 MR. ANDRE: Misstates testimony. Assumes facts
10 not in evidence and is --

11 MS. RICHARDSON: Let me --

12 MR. ANDRE: -- too long to be --

13 MS. RICHARDSON: Withdrawn. Withdrawn.
14 Withdrawn. Withdrawn.

15 BY MS. RICHARDSON:

16 Q. Based on what we just discussed, can you tell
17 me today, looking back at our friendship prior to 2021,
18 if I gave you a reason to believe that I had an ulterior
19 motive.

20 MR. HARRISON: There is no question there.
21 It's not a question.

22 BY MS. RICHARDSON:

23 Q. Looking back at our friendship prior to 2021,
24 can you identify a time when I did anything untoward?

25 MR. HARRISON: Okay. Objection. Vague --

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1 MS. RICHARDSON: Keeping the question as is.

2 MR. HARRISON: -- compound.

3 MS. RICHARDSON: Got it.

4 MR. HARRISON: You haven't even heard my
5 objection.

6 Vague --

7 MS. RICHARDSON: Okay. You don't have the
8 right to --

9 DEPOSITION OFFICER: Okay. One at a time.

10 MS. RICHARDSON: Todd, we're at the end --

11 MR. HARRISON: You got to let me finish.

12 MS. RICHARDSON: We're going to --

13 MR. HARRISON: Calls for speculation.

14 We are at the end. We're over ten --

15 MS. RICHARDSON: We're going to keep going --

16 DEPOSITION OFFICER: Okay. I'm not taking
17 anything down.

18 MR. ANDRE: All right.

19 MR. HARRISON: My -- my objection was vague,
20 compound, calls for speculation. It's also over ten
21 minutes. You promised us that we would be leaving in
22 ten minutes.

23 MS. RICHARDSON: When you make four-minute
24 objections to everything I say --

25 MR. HARRISON: I haven't -- haven't --

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1 MS. RICHARDSON: -- the timeline -- the time is
2 going to keep moving. So it doesn't --

3 MR. HARRISON: Okay.

4 MS. RICHARDSON: -- doesn't get -- count for
5 your objections.

6 MR. HARRISON: Okay. Got it.

7 BY MS. RICHARDSON:

8 Q. The question was, looking back at our
9 friendship, if I had ever done anything untoward, in
10 your opinion, prior to 2021.

11 MR. HARRISON: Objection. Compound. Vague.
12 Calls for speculation.

13 MS. RICHARDSON: Oh my God.

14 MR. HARRISON: I'm sorry. Did you -- what did
15 you say?

16 MS. RICHARDSON: Nothing. I don't think that
17 went on the record, so I don't think it's of concern.

18 DEPOSITION OFFICER: It did.

19 MS. RICHARDSON: Okay. I said, "Oh my God."

20 MR. HARRISON: That's what I thought.

21 THE WITNESS: I can't answer that question.

22 BY MS. RICHARDSON:

23 Q. Can you tell me why you can't answer it?

24 MR. HARRISON: Objection. Asked and answered.

25 ///

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1 BY MS. RICHARDSON:

2 Q. You were aware how important Beau was to me;
3 correct?

4 MR. HARRISON: Objection. Calls for
5 speculation. Vague.

6 THE WITNESS: I know Beau was a very dear
7 friend.

8 BY MS. RICHARDSON:

9 Q. Did you know that for several years I purchased
10 her groceries weekly because she was having financial
11 difficulties?

12 A. I was not aware of your financial arrangement
13 with Beau.

14 Q. Were you aware that Beau wanted me and Michelle
15 to have the house -- not given, but that she wanted us
16 to find a way to buy it?

17 Were you aware of that?

18 MR. HARRISON: Objection. Compound. Calls for
19 speculation.

20 BY MS. RICHARDSON:

21 Q. Okay. Let me rephrase the question.

22 Were you aware how important Beau's house was
23 to me?

24 MR. HARRISON: Objection. Calls for
25 speculation.

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1 MS. RICHARDSON: That's fine.

2 MR. HARRISON: If you can answer, try. If you
3 can't, you can't.

4 THE WITNESS: Yes. You -- you -- you and
5 Michelle both loved that house.

6 BY MS. RICHARDSON:

7 Q. It was no secret that I wanted to live in and
8 purchase that home, was it?

9 A. Every -- it was no secret that you wanted that
10 home.

11 Q. No.

12 And I never -- I never -- okay. Let me
13 rephrase this.

14 Did I ever ask you to purchase that home for
15 me?

16 MR. HARRISON: Objection to form.

17 Go ahead.

18 THE WITNESS: Objection to form.

19 BY MS. RICHARDSON:

20 Q. Did I ever ask you to purchase Beau's home for
21 me?

22 A. You asked my friends to -- that you -- that you
23 asked my friends if you should ask me, and you told my
24 friends that you wanted them -- you wanted me to buy
25 your house. So you didn't directly ask me to buy you

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1 the house. You spoke about that to my friends.

2 Q. You believe this?

3 MR. HARRISON: Objection. Asked and answered.

4 BY MS. RICHARDSON:

5 Q. I -- I -- in the past I have made no mistake
6 that I wanted to purchase that home. When Beau passed
7 away I did not have the funds to do so. I remember at
8 one point we discussed if you bought it, I would be able
9 to purchase it from you later. But at no point did I
10 ever ask you to buy that house for me, did I?

11 MR. HARRISON: Objection. Compound. Pure
12 testimonial.

13 BY MS. RICHARDSON:

14 Q. Okay. I'm just going to go with this.

15 You knew that that house was --

16 MR. HARRISON: Are you really keeping us here
17 way past your ten-minute promise that you made to
18 everybody in this room to ask these questions -- these
19 harassing and intimidating questions? Is that why we're
20 still here?

21 MS. RICHARDSON: You are the reason that we're
22 still here.

23 MR. HARRISON: Okay.

24 MS. RICHARDSON: Okay? Like, I would -- I
25 would really like to also get out of here. I've got a

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1 flight to catch, so there's a lot of reasons I have to
2 go, and I'm exhausted.

3 BY MS. RICHARDSON:

4 Q. I just want to say, finally, is it fair to say
5 that it was never -- it was no secret how badly I wanted
6 that house?

7 MR. HARRISON: Asked and answered. Objection
8 to form.

9 THE WITNESS: Everyone knew you really wanted
10 that house. Everybody knew it. It's no secret.

11 MS. RICHARDSON: Was there --

12 MR. HARRISON: You just said that was the final
13 question.

14 MS. RICHARDSON: Okay. That's fine. All
15 right.

16 THE VIDEOGRAPHER: Anything, Theresa?

17 DEPOSITION OFFICER: Would you like to order a
18 copy?

19 MR. HARRISON: Yeah. Can we get a rush on it,
20 please?

21 DEPOSITION OFFICER: Sure.

22 MR. ANDRE: Also, just state for reference, so
23 while we were here the Court did enter a protective
24 order with regard to confidentiality in this case. We'd
25 ask that the transcript be marked confidential at this

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1 time, subject to us providing specific confidentiality
2 designations within 15 days as provided in the
3 protective order. Obviously, Ms. Richardson, you're
4 also welcome to designate portions of the transcript
5 confidential, if you would like to, as well.

6 THE VIDEOGRAPHER: Counsel, any video?

7 MR. HARRISON: What's that?

8 Yeah, please.

9 THE VIDEOGRAPHER: Okay. That's it?

10 This conclude today's deposition of Ms. Taylor
11 Thomson at 6:23.

12 (Deposition session concluded at 6:23 p.m. Pacific Time)

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1 I have read the foregoing and by signing hereafter,
2 approve same.

3

4 Dated _____.

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6 _____
(Signature of Deponent)

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1 DEPOSITION OFFICER'S CERTIFICATE

2

3 STATE OF CALIFORNIA }

} ss.

4 COUNTY OF LOS ANGELES }

5

6 I, THERESA JOANN PHILLIPS-BLACKWELL, hereby
7 certify:

8 I am a duly qualified Certified Shorthand
9 Reporter in the State of California, holder of
10 Certificate Number CSR 12700 issued by the Court
11 Reporters Board of California and which is in full force
12 and effect. (Fed. R Civ. P. 28(a)).

13 I am authorized to administer oaths or
14 affirmations pursuant to California Code of Civil
15 Procedure, Section 2093(b) and prior to being examined,
16 the witness was first duly sworn by me. (Fed. R. Civ.
17 P. 28(a), 30(f)(1)).

18 I am not a relative or employee or attorney or
19 counsel of any of the parties, nor am I a relative or of
20 such attorney or counsel, nor am I financially
21 interested in this action. (Fed. R. Civ. P. 28).

22 I am the deposition officer that
23 stenographically recorded the testimony in the foregoing
24 deposition and the foregoing transcript is a true record

25 ///

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1 of the testimony given by the witness. (Fed. R. Civ. P.
2 30(f)(1)).

3 Before Completion of the deposition, review of
4 the transcript { } was { } was not requested. If
5 requested, any changes made by the deponent (and
6 provided to the reporter) during the period allowed, are
7 appended hereto. (Fed. R. Civ. P. 30(e)).

8

9 Dated: _____, 2025

10

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Theresa J. Phillips-Blackwell

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EXHIBIT B

From: Ashley Richardson ashrichardson@mac.com
Subject: Re: Objections & Request for Extension
Date: 7 May 2025 at 04:46
To: Todd Harrison Tdharrison@mwe.com
Cc: Josh Yim jyim@mwe.com, Joseph Evans Jbevans@mwe.com



Todd,

Thank you for your response. I confirm availability for a meet-and-confer today, May 7, 3pm. Eastern.

As noted previously, I preserved my objections based on improper service of Plaintiff's discovery demands, and I documented that I did not consent to email-only service. I am continuing to act in good faith and request a reasonable extension through May 30 to complete my responses due to hardship, logistical limitations, and the volume of materials involved.

Additionally, because the Court previously denied my Motion to Compel Deposition of Ms. Thomson without prejudice for failure to meet and confer, I intend to use this conversation to satisfy that procedural requirement. Please be prepared to provide Plaintiff's availability for deposition so we may avoid unnecessary motion practice.

Please let me know the best number to reach you, or if you have a dial in you would prefer to use.

Best,
Ashley Richardson

On May 6, 2025, at 9:29 PM, Harrison, Todd <Tdharrison@mwe.com> wrote:

Ms. Richardson -

You have had over seven months to review and consider our initial discovery demands which are narrowly tailored to the allegations in our initial Complaint and your Counterclaims, which were filed long ago. Over those seven months, you had a responsibility to review your own records and communications and provide a timely response. Apparently you have done nothing, and you provide no specifics as to why you have somehow been unable to do so, or why you need more time to undertake these relatively basic tasks. Continually pretending that there was some imagined imperfection in the service of everything that you have clearly received, including the discovery demands, is a patently obvious stall tactic. Accordingly, we fail to see why you are unable to respond to our discovery demands as this information should be readily available to you. We are available for a meet and confer tomorrow between 3 and 5:30 pm Eastern.

TODD HARRISON
Partner
[McDermott Will & Emery LLP](#) One Vanderbilt Avenue, New York, NY 10017-3852
[Tel](#) +1 212 547 5727 | [Mobile](#) +1 917 797 1728 | [Email](#) tdharrison@mwe.com
[Website](#) | [vCard](#) | [Twitter](#) | [LinkedIn](#)

On May 5, 2025, at 2:39 PM, Ashley Richardson <ashrichardson@mac.com> wrote:

[External Email]

Todd,

This extension is in no way workable in my current circumstances.

Due to significant ongoing hardship caused by your client's actions—including financial instability, loss of essential equipment, and lack of resources—I am unable to fully and accurately comply with the current timeline. I am requesting a reasonable extension to May 30, 2025 to complete production and responses.

If your client is unwilling to stipulate, please provide your earliest availability for a meet-and-confer to discuss:

1.
Improper service of the original discovery demands;
2.
My intention to file a revised motion to compel deposition testimony.

I remain committed to participating in discovery in good faith and hope we can resolve this without further court involvement.

Best,
Ashley

Sent from my iPhone

On Apr 30, 2025, at 2:01 PM, Yim, Josh <jyim@mwe.com> wrote:

Ashley,

As we have made clear, your failure to timely respond to discovery has waived your objections. Nevertheless, we are amenable to a 7-day extension, and we can have that argument later. Accordingly, we expect your "full substantive responses" by May 7, 2025.

Best,
Josh

JOSH YIM
Associate

McDermott Will & Emery LLP 2049 Century Park East, Suite 3200, Los Angeles, CA 90067-3206

Tel +1 310 277 4110 | Email jyim@mwe.com

Website | [vCard](#) | [LinkedIn](#)

From: Ashley Richardson <ashrichardson@mac.com>

Sent: Wednesday, April 30, 2025 10:21 AM

To: Harrison, Todd <Tdarrison@mwe.com>

Cc: Yim, Josh <jyim@mwe.com>; Evans, Joseph <Jbevans@mwe.com>

Subject: Objections & Request for Extention

[External Email]

Dear Todd,

Please find communication related to objections and request for reasonable extension attached.

Please advise whether Plaintiff is willing to stipulate to a 30-day extension by EOD. If Plaintiff declines to stipulate, or no response is received, I reserve all rights and will seek appropriate relief from the Court.

Best,
Ashley

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Please visit <http://www.mwe.com/> for more information about our Firm.

EXHIBIT C

From: Ashley Richardson ashrichardson@mac.com

Subject: Meet and Confer - Request for Production of Documents

Date: 29 July 2025 at 12:37

To: Todd Harrison Tdharrison@mwe.com

Cc: Josh Yim jyim@mwe.com, Joseph Evans Jbevans@mwe.com



Dear Todd,

I write pursuant to our obligation to meet and confer regarding Plaintiff Taylor Thomson's July 7, 2025 responses and objections to Defendant's First Set of Requests for Production of Documents.

After reviewing Plaintiff's responses, I must express serious concern over the pattern of blanket objections, evasive language, and refusal to produce clearly relevant materials. Plaintiff appears to be withholding responsive documents critical to the defense and counterclaims—including but not limited to:

- Communications between Plaintiff and Defendant concerning the trades and investment agreement (RFP 4–5, 13)
- Plaintiff's rationale, due diligence process, and third-party input regarding the investment (RFP 10–12)
- Documents related to the Singapore lawsuit and the now-dismissed California protective order (RFP 15–17)
- Communications with third parties regarding media inquiries or coverage (RFP 18)

These documents go directly to the heart of the claims and defenses in this case and are not shielded by any valid privilege or overbreadth objection. The attempt to deflect on relevance is especially concerning given Plaintiff's own use of similar materials in public statements and court filings.

I have been making efforts to produce documents, and continue to. To date, Ms. Thomson has produced no documents.

Let me be clear: if Plaintiff continues to refuse production of these materials, I will have no choice but to move to compel and request sanctions for bad faith discovery practices.

Please let me know your earliest available for a meet and confer, no later than EOD Wednesday July 30th.

Sincerely,

Ashley Richardson

EXHIBIT D

From: Ashley Richardson ashrichardson@mac.com
Subject: Re: Meet and Confer - Request for Production of Documents
Date: 11 August 2025 at 19:44
To: Harrison, Todd Tdharrison@mwe.com
Cc: Yim, Josh jyim@mwe.com, Evans, Joseph Jbevans@mwe.com



Mr. Harrison,

Your repeated assertions that my discovery delays reflect a lack of evidence are frivolous. Any delay has been the result of catastrophic harm caused to me by your client, compounded by the trauma resulting from this process, not from any lack of substantive evidence. I continue to make good-faith efforts to produce responsive documents while navigating complex procedural rules and continue to try to locate materials that may or may not exist or are not in my possession.

Several issues in your recent email and in Plaintiff's conduct require immediate attention:

1. Improper Blanket Objections – FRCP 34

FRCP 34 requires objections to be specific, to state the scope of materials being withheld, and to provide the factual basis for each objection. Plaintiff's responses fail to comply—particularly in avoiding production of the parties' text message exchanges and other plainly relevant evidence central to my claims and defenses. Your objections clearly are calculated to avoid producing damaging but discoverable materials.

2. Unsupported and Prejudicial Accusations – FRCP 26(g)

Your recent email accuses me of criminal/extortionate conduct without evidence. In fact, the opposite is true. You generated press attention for this matter by acting unethically. Then, on top of that, you sought my cooperation in providing false testimony in exchange for dismissal, which I refused. Your conduct was unprofessional, prejudicial, and contrary to FRCP 26(g), which certifies that discovery responses and objections must be consistent with the rules, warranted by law, and not interposed for an improper purpose. Such accusations will be preserved for potential presentation to the Court and the entity that regulates attorney conduct.

3. Pattern of Obstruction and Harassment – Grounds for Protective Relief under FRCP 26(c)

In addition to these discovery abuses, your team has engaged in intimidation, including sending Guidepost private investigators to the homes of my elderly mother and sister within days of our last correspondence. Your conduct, at minimum, was unprofessional. The unannounced intrusion into my mother's living room caused her to collapse from stress and require hospitalisation. This conduct is harassing, oppressive, and directly relevant to good cause for a protective order.

On August 3rd, I was hospitalised with a bowel obstruction. Shortly thereafter, I was forced to take on added responsibilities of caring for my mother following the incident described above. Despite these extraordinary circumstances, I have completed all requests from your July 11th email that relate to Persistence, produced thousands of additional highly relevant documents by adding them to my discovery folder, and provided your team with nearly completed interrogatories. You, by contrast, have produced nothing, not a single document in this case so far, because you know that your production of the highly relevant evidence I am seeking will result in your clients position and expose them to civil liability.

Finally, your client chose to file into public record my private and vulnerable text messages, sent during a documented mental health crisis resulting in relapse, as part of a baseless restraining order. This was a continuation of her false narrative, now portraying me as a physical threat. That filing, not my actions, generated the resulting press coverage and continued press interest in this matter. The press coverage you generated has caused far greater damage to me than it ever could to your client. Expecting me not to defend myself against the baseless and harmful public allegations your client has made and continues to make is not realistic.

I expect your client to comply immediately with the Federal Rules and produce responsive materials without further obstruction, including but not limited to immediately scheduling a date for her deposition. I have been seeking her deposition for 11 months now, and it is clear that you will do everything you can to avoid it.

I expressly reserve all rights, legal and equitable, including the right to challenge your conduct as

unethical, improper, harassing, and outside the scope of this proceeding.

Regards,
Ashley Richardson

On 3 Aug 2025, at 10:46, Harrison, Todd <Tdharrison@mwe.com> wrote:

Ms. Richardson - I disagree with your email below because, as usual, none of it is true. I assume that you are frustrated because the improper threats by you and your lawyer that you would make false and defamatory statements to the press unless my client paid you millions of dollars did not work. But that is no reason for you to continually lash out as you do below. More to the point, you keep claiming that you have lots of devastating evidence, but you continually refuse to say what it is or produce it in discovery, despite our repeated requests. If you actually had such evidence, you would want to produce it. It seems clear that you have no such evidence, as we have always believed. If you do, produce it. As I stated previously, I am on family vacation until August 11. I will not be responding to any more of your emails until then. If you produce your evidence and fully answer the Interrogatories by August 11, I will be happy to have a discussion with you regarding any outstanding issues.

Sincerely, Todd Harrison

TODD HARRISON

Partner

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[Website](#) | [vCard](#) | [Twitter](#) | [LinkedIn](#)

On Jul 31, 2025, at 3:33 PM, Ashley Richardson <ashrichardson@mac.com> wrote:

[External Email]

Dear Todd,

There are several mischaracterizations in your recent email that require correction.

First, unlike your own team, I have never demanded immediate same-day responses for meet and confers, as evidenced in attached emails requesting same-day meet and confers, from Brianna Perez (2/9/24) and Josh Yim (7/22/24). Therefore accusing me of expecting you to be at my beck and call is insulting, inaccurate, and hypocritical especially when I have always responded in good faith and made myself available under similarly constrained timelines.

Second, your repeated attempts to claim I have ignored my discovery obligations are both inaccurate and demonstrably false. As a pro se litigant without legal support, I have been actively producing responsive documents and continue to do so in good faith. I have made substantial progress in reviewing, organizing, and preparing hundreds of documents, despite having no paralegal or litigation support staff. In contrast, your team has refused to comply with discovery procedures and has failed repeatedly to respond to deposition notices or produce even a single document.

It is also incorrect to imply that service of discovery occurred in September 2024. Under Federal Rule of Civil Procedure 5(b) (2)(E) electronic service is valid only with the express written consent of the receiving party. As a self-represented litigant, I have never provided such consent, to the contrary: I informed your team multiple times this was not an appropriate means of service as emails were going to my spam folder. Your attempted service via email was therefore legally ineffective. As you are well aware, discovery requests were mailed on March 21, 2025, and actual service was triggered on March 31, 2025. If your continued disregard for proper service procedures, attempts to retroactively enforce deadlines, and intimidation tactics do not cease immediately, please be advised, they will be addressed with the Court.

Lastly, your baseless assertion that I "have no evidence" is not only inaccurate—it is a deliberate mischaracterization of the record. I have extensive documentation, corroborating communications, and third-party materials that demonstrate, in exhaustive detail, the irreparable harm Ms. Thomson has inflicted upon my life. This includes but is not limited to: financial ruin, reputational devastation, and severe emotional and physical trauma—each of which will be meticulously presented in court when this matter proceeds to trial.

Let me be clear, I am not some desperate individual scrambling to invent a defense. I am someone who trusted your client, supported her unconditionally, and who was ultimately left devastated to face the fallout of her extreme negligence, manipulation, and calculated harm. My evidence is not theoretical—it is voluminous, precise, and devastating.

If your team believes otherwise, I suggest you participate with the discovery process so that we can proceed to trial and allow a jury to decide.

I remain willing to participate in a meet and confer at a mutually agreeable time no later than August 1, 2025, but I will not be intimidated or bullied into compliance with misrepresented timelines and baseless accusations.